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South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

March 28, 2007

Ms. Carrie Pourvahidi, Deputy Director
ATTN: Palmdale-Los Angeles,
California High-Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

Dear Ms. Pourvahidi:

Notice of Preparation of a Draft Environmental Impact Report/Statement for Palmdale to Los Angeles section of the California High-Speed Train System

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment files. Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, the lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2002 Model. This model is available on the SCAQMD Website at: www.aqmd.gov/ceqa/models.html.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM2.5 emissions from construction and operational activities and processes. In connection with developing PM2.5 calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM2.5 emissions and compare the results to the recommended PM2.5 significance thresholds. Guidance for calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at http://www.aqmd.gov/ceqa/handbook/LST/LST.html.

It is recommended that lead agencies for projects generating or attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA webpages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA webpages at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: http://www.aqmd.gov/prdas/aqguide/aqguide.html. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: http://www.arb.ca.gov/ch/handbook.pdf. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (http://www.aqmd.gov).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Charles Blankson, Ph.D., Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,

Steve Smith

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development and Area Sources

SS:CB:li
LAC070322-02LI
Control Number

R-2

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
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STEPHEN R. MAGUIN
Chief Engineer and General Manager

March 28, 2007

File No: 20-00.04-00
SCV-00.04-00

Ms. Carrie Pourvahidi, Deputy Director
Attn. Palmdale-Los Angeles
California High Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

Dear Ms. Pourvahidi:

Palmdale to Los Angeles Section of the California High Speed Train System

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Project Level Environmental Impact Report/Environmental Impact Statement for the subject project on March 19, 2007. We offer the following comments:

- The proposed project may impact several existing and/or proposed Districts' trunk sewers over which it will be constructed. Existing and proposed Districts' trunk sewers may be located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of the proposed project until project plans and specifications that incorporate Districts' sewer lines are submitted. In order to prepare these plans, you will need to submit a map of the proposed project alignment, when available, to the attention of Mr. Tommy Sung of the Districts' Sewer Design Section at the address shown above. The Districts will then provide you with the plans for all Districts' facilities that will be impacted by the proposed project. Then, when revised plans that incorporate our sewers have been prepared, please submit copies of the same for our review and comment.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Stephen R. Maguin

Ruth I. Frazen
Engineering Technician
Facilities Planning Department

RIF:rf
cc: T. Sung

Doc #: 766276.1

R-4

Dan Leavitt

From: Jui Ing Chien [jchien@parks.lacounty.gov]
Sent: Thursday, April 26, 2007 4:59 PM
To: Carrie Pourvahidi; Dan Leavitt
Subject: Scoping Comments from Los Angeles County Parks and Recreation

Carrie and Dan,

Los Angeles County Parks and Recreations needs more time to work on our comments which will address the project impacts on our parks and trails.

We would like to submit the comments for both "Palmdale to LA" and "LA to OC" on Monday, April 30. (Originally due April 27)

Thank you.

Jui Ing Chien

Park Planner
County of Los Angeles
Department of Parks and Recreation
Planning and Development Agency
510 South Vermont Avenue, 2nd Floor
Los Angeles, CA 90020
Email: jchien@parks.lacounty.gov
Phone: (213) 351-5129
Fax: (213) 639-3959

R-5

Rachel Weninger

From: Chong, Suk [SCHONG@dpw.lacounty.gov]
Sent: Monday, April 23, 2007 6:17 PM
To: Comments
Cc: Contreras, Danielle
Subject: Palmdale - Los Angeles - California High-Speed Train System - NOP for EIR/EIS

Ms. Carrie Pourvahidi

We have reviewed the Notice of Preparation (NOP) of the Project Level Environmental Impact Report / Environmental Impact Statement (EIR/EIS) for the Palmdale to Los Angeles section of the California High-Speed Train (HST) System. The project proposes to construct, operate, and maintain an electric-powered steel-wheel-on-steel-rail HST system, over 700 miles long, capable of speeds in excess of 200 miles per hour on dedicated, fully grade-separated tracks, with state-of-the-art safety, signaling, and automated train control systems. The proposed project would impact the Santa Clara and the Los Angeles Rivers. We offer the following comments for your consideration:

A steel-wheel-on-steel-rail HST will require land areas that serve the ecosystem and natural habitats. The current plan to construct the rail through Soledad Canyon (considered a valuable wildlife corridor by the South Coast Missing Linkages Project, 2004) and along the Santa Clara River has the potential to negatively impact local riparian habitats and wildlife along the river. We recommend that the HST be built outside the 500-year flood plain of the Santa Clara River away from critical habitat areas and potential floodwater. The proposed alignment for the railroad corridor should include wildlife under crossings and address associated impacts to existing natural drainage courses and man-made flood management facilities.

The HST will be involved in land acquisition in order to establish its rail tracks. We believe acquisitions within or adjacent to the 500-year flood plain of the Santa Clara River would conflict with our Department's efforts to develop water quality, flood control and water conservation projects. Furthermore in the Antelope Valley, acquisitions associated with the proposed rail alignment must be coordinated with the 1987 Antelope Valley Comprehensive Plan of Flood Control and Water Conservation, which delineates proposed dedicated waterways and basins for the region.

Water supply is crucial to both Santa Clara River and Antelope Valley watersheds. Stations and parking lots associated with this project can have the potential to leave a large impervious footprint that may impede the ability of water to percolate into the ground. We recommend minimizing the size of footprints to allow maximum percolation and to reduce storm water runoff impacts to downstream properties. We also recommend exploring the use of porous asphalt pavement for permeable parking lots. Where there is landscaping at the stations or alongside the rails, use native plants to minimize consumption of water and use recycled water for irrigation.

The NOP suggests a potential alignment adjacent to Taylor Yard in the City of Los Angeles. Taylor Yard is located adjacent to the Los Angeles River and is the site of the future Rio de Los Angeles State Park.

Proposals that promote connectivity between the Los Angeles River and various activity centers are consistent with the mission and vision of the Los Angeles River Master Plan. However, we have the following concerns that we would like addressed as plans for the high-speed rail system move forward.

o Aesthetic goals for the River greenway may be compromised if the HST system leads to obstructed views and creates blight along the River greenway.

o Connectivity is promoted if there is a stop in the vicinity of the Los Angeles River. As proposals move forward, we ask that plans for a stop in the vicinity of the Rio de Los Angeles State Park be considered.

o In addition to a suggested stop in the vicinity of the Los Angeles River, we ask that the proposal consider opportunities to develop green connections between the River and the suggested transit stop.

o The suggested green connections will help to link both the local community and travelers to the Los Angeles River.

When ready for public review, please forward three copies of the EIR/EIS to:

Mr. Suk Chong
County of Los Angeles
Department of Public Works
Land Development Division
P.O. Box 1460
Alhambra, California 91802-1460

If the EIR/EIS is available electronically or on-line, please forward it or the link to Mr. Chong at schong@dpw.lacounty.gov <mailto:schong@ladpw.org>.

If you have any questions, please contact Mr. Chong at (626) 458-7150.

METROLINK
SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY

April 20, 2007

Mr. Dan Leavitt
Deputy Director
California High Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

Re: Environmental Impact Statement for the California High Speed Train System From Palmdale to Los Angeles, CA

Dear Mr. Leavitt:

The purpose of this letter is to highlight issues that need to be addressed on several topics associated with the development of the scope of the Environmental Impact Report/ Environmental Impact Statement (EIR/EIS) for the California High Speed Train System. Our comments are based upon the Notice of Intent issued by the Federal Railroad Administration (FRA) U.S. Department of Transportation (DOT) on March 15, 2007.

The Southern California Regional Rail Authority (SCRRA) is a California joint powers authority which is the operator of Metrolink commuter rail service and, acting for our member agencies, operates and maintains railroad right-of-way in the six county area utilized by our commuter rail service, Amtrak Pacific Surfliner and long distance service, and Union Pacific and Burlington Northern Santa Fe freight service. Our five member agencies own the rights necessary to operate commuter rail on existing rights-of-way. As a procedural matter, we draw your attention to the mandatory consulting provisions of State CEQA Guidelines Section 15086, which indicates, among its other relevant requirements, that SCRRA, as well as a number of its public agency members and city and county station locations are covered by the mandatory consultation requirements of this section. In addition, the SCRRA, our member agencies, and city and county station owners will need to approve zoning, construction and operating entitlements, and are therefore responsible agencies for purposes of CEQA. Further, SCRRA staff offers specific geographic and technical expertise in the 5-county Metrolink service area.

At this time, the SCRRA Board has three substantive areas of concern: Service Competition and impacts on Metrolink stations and surrounding communities, Right-of-way / Construction Conflicts, and Metrolink Subsidy / Operating and Capital Cost Impacts.

A number of our concerns were raised in earlier correspondence, including August 2004 comments. Most of the Authority's responses to Metrolink's concerns in that process concluded that Metrolink's concerns needed to be addressed at the project level analysis and that the Authority would work closely with SCRRA should project level analysis go forward. Now that we are at the project level review for CEQA purposes, SCRRA anticipates that a schedule for such close cooperation will be established in the near future so that the Authority can address the concerns in this letter and others, which may arise during the review process well before the release of the draft for public review. We request you set up a schedule to allow for regular consultation during the EIS/EIR process.

Further, the Program EIR findings, mitigation measures and Statement of Overriding Considerations are based only upon the Program level analysis by their own terms. Therefore, SCRRA anticipates that the evaluation at the project level will be at a completely new level of substantive analysis so that the Authority will have substantial evidence in the record on which decisions can me made and which can adequately support any project level findings.

The concerns that should be addressed in our three broad interest areas are summarized below.

Service Competition – Separate analyses are required to clearly understand the potential competitive and complementary service issues between Metrolink and High Speed Train service. To be complementary, the Metrolink service will have to be treated as an independent commuter rail operation and as an inter-city feeder service to the new state high-speed trunk line. Complementary operating plans and common station access elements must be developed. The impacts of the High Speed Train system on Metrolink's potential to grow consistent with the adopted 2007 SCRRA Strategic Assessment must be considered in the EIR/EIS.

Eighty-eight percent of Metrolink riders who formerly made the trip, drove alone or carpooled before switching to Metrolink. By taking these cars off the road, Metrolink has a significant beneficial environmental impact to air quality and freeway congestion. We are concerned that the High Speed Train system, by limiting our growth capacity, limiting access to our stations, or by increasing our operating costs or subsidies, will limit our ability to meet projected ridership demand and to continue to divert automobile trips. The environmental documentation for the High Speed Train system will have to address the potential for the new service to create an adverse environmental impact.

The Metrolink stations are owned by the local cities or the SCRRA member agencies, not by the SCRRA. Station cities that are continuing to invest in what are proposed to be joint Metrolink / High Speed Train stations would be faced with a quantum increase in station access issues and operational costs. These jurisdictions are already experiencing

community and financial impacts as their stations approach design capacity. The new demand would exceed current capacity at proposed shared stations and could cause current Metrolink riders to divert to non-HST stations in the corridor, thus creating spillover parking issues. The impact of this added burden on these cities would have to be considered in order for the High Speed Train project to accurately reflect the additional capital cost to expand street and highway access, station parking and transit facilities and the ongoing subsidy required to operate the expanded stations and/or the greatly increased transit access. We strongly suggest that you communicate directly with the potentially affected jurisdictions. The cities potentially affected by the HST stations include Lancaster, Palmdale, Santa Clarita, Sylmar, San Fernando, Burbank, Glendale, and Los Angeles.

The issues that must be addressed in the EIR/EIS are listed below:

a. The impact of Metrolink rider diversion to the High Speed Train System
b. The impact of the High Speed Train system on growth of Metrolink due to both physical and financial constraints on Metrolink's ability to expand service
c. The impact of the High Speed Train system on growth of goods movement by rail and SCRRA member agencies needs to describe ownership and financial responsibility for construction and operation of stations, including platforms, parking, customer information systems, ticket vending systems, security, and federal common carrier obligations due to physical and financial constraints on Metrolink.
d. The impact of the high speed train system on joint station access requirements (must consider both parking and transit feeder needs)
e. Additional costs and impacts in the vicinity of station locations related to street and highway congestion
f. Since this will be an FRA safety-regulated operator, identification of construction requirements and costs and increased operating costs unique to such an operation must be addressed.
g. FRA requirements and limitations for shared use of Metrolink-dispatched lines that carry commuter and high-speed passenger and freight services must also be addressed and in particular the use of compliant or non-compliant vehicles in shared corridors.

Right-of-way / Construction Conflicts – Segments of the High Speed Train technology will require a dedicated right-of-way, and will likely be constructed on aerial structure with aerial stations above Metrolink and freight tracks. Other segments of the High Speed Train network, in congested urban corridors, may be operated on either a shared corridor or even a shared track basis with capital investment necessary to allow higher-speed train operations consistent with FRA regulations. Design coordination is required with the owners of the rights-of-way, Amtrak, Caltrans, the commuter and freight operators, and the station owners during the scoping of the EIR/EIS. Specific issues related to SCRRA right-of-way include the following:

a. Adopted regional plans call for Metrolink service to grow from 42,000 daily riders to more about 100,000 daily riders by 2020, increased Amtrak intercity service and freight train growth. To accommodate this growth, SCRRA and the other railroad owners will need to expand track capacity. The construction of a new High Speed Train structure and/or integration of High Speed rail into at-grade track facilities on existing rail right of way will require the use of valuable and irreplaceable rail corridor property that could have otherwise been used to expand conventional rail service facilities. The detailed design of the High Speed Train system must actually re-design the whole rail corridor for this combination of uses, and must recognize the ultimate build-out of the conventional system as described in the SCRRA Strategic Assessment adopted by the SCRRA Board on January 26, 2007 and available on the Metrolink website at www.metrolinktrains.com. Some of the details to consider in these designs are impacts on parallel and transverse utilities (buried and aerial), sight lines for signals and stations, passenger access to stations, future additional tracks, rail corridor maintenance equipment and maintenance personnel access, acts where the design forces tracks closer to adjoining sensitive receptors.
b. The California DOT has adopted and environmentally cleared plans for "run thru" tracks (unfunded as of March, 2007) south of Union Station. The HSR project should either avoid impacting the as-designed project or should include an alternate project of similar utility.
c. For those segments of the High Speed Train network, in congested urban corridors, that may be operating in mixed traffic, the EIR/EIS must address the impacts on both passenger and freight rail service of the shared use of existing rail rights-of-way. The issues related to operating FRA compatible or non-compatible equipment on a shared corridor or shared track basis and operating California PUC compliant platforms and horizontal and vertical clearances should be determined very early in the project development process and before preliminary track alignment and station configurations are determined. Some but not all of the impacts to be addressed will include:
   - FRA regulation,
   - use of compliant or non-compliant vehicles for both the shared track and shared corridor scenarios,
   - constraints on growth of existing passenger and freight rail services,
   - SCRRA member agency common carrier obligations,
   - competition between these modes, and
   - operational impacts.
   - California PUC regulations regarding vertical and horizontal clearances including those regulations specifically pertaining to platforms.
h. The use of the SCRRA alignment through the area around our Central Maintenance Facility has unacceptably sharp curves for high-speed trains. The High Speed Train alignment may need to return to the original Southern Pacific alignment (on a viaduct?) parallel to San Fernando Road.

i. If the High Speed Train route (either as a spur or enroute to Bakersfield) follows the SCRRA corridor through the Santa Clarita/Soledad canyon, almost no use of the actual right of way is feasible due to curvature and erosion threats from the river. A new alignment with larger radius and above flood stages is required. This corridor should be environmentally cleared to be shared with the SCRRA commuter service.
j. The impact on Metrolink services during construction of the High Speed Train stations and coordination of construction without significantly disrupting the existing service at Metrolink Stations also needs to be carefully addressed in the EIR/EIS. Construction staging plans should ensure the construction does not materially interfere with the passenger flows at stations.
k. Similarly the construction impacts of the High Speed Train system on both SCRRA and freight operations must be carefully addressed in the EIR/EIS. Construction staging plans should ensure the construction does not materially interfere with the operating speeds and number of available tracks of the corridors during all stages of construction and does not place undue burden on Metrolink's ability to provide resources (equipment, flag persons, signal and track maintenance forces, engineering review and approval) to support the project. As a general rule any construction activity involving excavations, structures, or significant grading or related activities which is closer than 30 feet to an existing (or future built track) could pose a significant impact on ongoing operations. In order to avoid impacts to ongoing Metrolink operations, most of the construction work within the rail corridor will occur at night and on weekends during when rail traffic levels are lessened. The impacts of performing this nighttime and weekend work should be clearly defined.
l. Adding Overhead Catenary System (OCS) to these joint passenger and freight corridors may have severe institutional and cost impacts, which must be addressed if proposed.
m. Other considerations for shared use of tracks are platform height, ride quality, and right of way security. European HSR trains use platforms that are floor height (approximately one meter above the rail), however clearance requirements for tracks used by freight trains prohibit such platforms in California. High platforms do offer the safest, quickest boarding. Station bypass tracks for freight trains and separate platforms for commuter and regional trains on the bypass tracks may be required.
n. The primary design element of typical high-speed operation is that it is completely grade separated from highway (and pedestrian) traffic. If an existing railroad corridor is used for a High Speed Train route, the grade separation effort must result in separating **all** rail lines from conflicting traffic. These design criteria should include station and platform access. Failure to grade separate all rail lines will result in a permanent grade crossing conflict, since with the High Speed Train line separated, there will most often be no other possible vertical or horizontal area in which to adjust the street or existing track profile. This imposes

an unacceptable burden on the community (risk of accident, noise, traffic delay) and on the rail operators (accident, liability, speed constraints) and a significant potential growth constraint.

o. ROW availability must be considered not only for Metrolink, but also for freight expansion (double tracking, station conflicts) or any other transportation priorities of ROW owners
p. The EIR/EIS should address engineering feasibility of any partial use of any existing ROW.
q. Environmental impacts of constructing outside the existing ROW will need to be addressed.
r. The EIR/EIS must address the impact of shade, shadow, noise and vibration in non-industrial areas.

The corridors owned by SCRRA member agencies were conveyed by their original owners, the freight railroads, with the perpetual right to continue their freight business. Some of these lines are a part of the Strategic Network as identified by the U.S. Department of Defense. All are a part of the regional and national economy. Even lines that do not see heavy daily freight traffic are important redundant lines that are vital to continued goods movement when operating problems (fires, floods, wrecks, earthquakes) disrupt other lines. The general trend in rail freight traffic is increasing. The HSR project cannot diminish the utility of these corridors to continue to perform their goods movement function. Examples of freight considerations include grade (e.g. at highway separation projects), signal placement, freight customer access tracks, and clear length of freight sidings.

The exclusive use of existing rail corridors will likely impose geometric constraints on the High Speed Train system because the design criteria for classical rail lines tolerated much sharper curves. It is expected that the High Speed Train system will deviate from existing rail corridors at locations of sharp curvature. At these locations where the alignment of an existing corridor is improved the best thing for all transportation stakeholders would be to share this improved alignment with the present passenger users of the corridor. This should result in timesavings for all rail passengers, and the opportunity to return the old alignment back to exclusive freight service or another land use.

There may be several opportunities to mitigate the impact of the High Speed Train system that will reduce the impacts of other rail operations. Examples of this include the elimination of whistle noise (due to grade separation), sound barriers that isolate all rail vehicles, and possibly landscaping/linear parks along the new and existing rights of way. These positive benefits should be identified and integrated into the environmental process.

Metrolink Subsidy / Operating Cost Impacts – SCRRA staff is not yet convinced of the viability of profitable High Speed Train operations and is concerned that already scarce federal, state and local resources will be diverted to meet operating and maintenance subsidy and debt service if revenue projections are not met.

Metrolink and the High Speed Train system would have several common stations on all lines of the Metrolink system. SCRRA staff is very concerned with the operational subsidy requirements of these stations as well as the Metrolink system, particularly if the competition results in the High Speed Train system attracting riders from Metrolink trains rather than from single occupant vehicles. In addition, a logical consequence of lower than expected High Speed Train ridership would be to seek operating subsidies that would allow reduction of fares, a double edged sword for Metrolink since High Speed Train would be competing for subsidies and offering more competitive fares to attract Metrolink riders. Diversion of these subsidies from Metrolink to High Speed Train would have a significant effect on the viability of the Metrolink system. By taking cars off the road, Metrolink has a beneficial environmental impact. By increasing our operating costs or subsidies the High Speed Train system will limit our ability to meet projected ridership demand and to continue to divert automobile trips. Should this occur, the High Speed Train system would have an adverse environmental impact, which must be explicitly addressed in the EIR/EIS.

Detailed analysis is needed to determine if it is financially feasible for Metrolink to become a cost-effective High Speed Train feeder rail service, as envisioned given our projected headways as described in the SCRRA Strategic Assessment. In addition, subsidy policies and fare policies need to be evaluated as a coordinated set rather than in isolation so that the fare subsidy costs could be properly allocated through an equitable interagency agreement.

The EIR/EIS should address the mitigation of loss of revenue opportunity to the SCRRA and its member agencies in the areas of fiber optic, freight dispatch, billboard, and other commercial uses of our property.

Tracks used by large numbers of freight trains are difficult to maintain to the limits of track geometry deviations required for even moderately high-speed passenger trains. This situation can be mitigated by careful selection of components and design of infrastructure, and by careful management of the maintenance process, including payment to line owners for higher levels of maintenance. The EIR/EIS needs to evaluate the maintenance windows required for joint operation and potential adverse impacts due to 24-hour maintenance operations or reductions in operating capacity due to speed restrictions.

A thorough grade separation program can enhance right of way security for both HSR and improved conventional lines. Unless and until such separation is achieved, additional

fencing, signage, lighting, and education of the public, money for maintenance of these features, and increased attention by law enforcement agencies is essential. The mitigating project safety elements should be clearly described in the EIR/EIS.

Capital Cost Impacts

SCRRA staff is concerned that construction of the High Speed Train system will divert already limited state and federal funding from Metrolink projects. Although the two systems serve quite distinct interregional needs, the High Speed Train system should not be funded in lieu of funding for expansion of the Metrolink system. The EIR/EIS must address the effect on available public funding for all passenger and freight rail systems in the state.

Process and Review Issues

Once conceptual designs and the draft EIR/EIS have been completed, SCRRA would be happy to make more detailed comments. Should you wish to make that information available on an earlier time schedule, we would be available to submit interim reviews. On that point, the draft public review schedule continues to anticipate an unrealistically short time for a reasonable review of these documents by interested parties. More than 45 days is clearly required in a project of this magnitude with a multiplicity of anticipated adverse environmental impacts. As we indicated in earlier correspondence, this project meets the unusual circumstances test required to increase the public comment period under CEQA. As an example, the joint EIS/EIR for the Los Angeles International Airport Proposed Master Plan Improvements had a public review period of 180 days. Furthermore, it seems to be just poor public relations to give interested parties 45 days to review these environmental documents which have taken years for the Authority to draft.

Therefore, SCRRA requests that at least a 180-day public review period for this project be incorporated into the schedule. The draft schedule for finalization of the environmental documents after the comment period closes also seems unreasonably short. In light of the number of substantive comments which can reasonably be expected, and the requirement to provide written responses which provide a good faith reasoned analysis with supporting factual information, a time period this short suggests the comments to the documents could not be appropriately evaluated and incorporated into the final documents.

We request that all comment letters be posted on your website. If this is not possible, we would request copies of all comments received within two weeks of the close of the review period, as well as any comment letters delivered late.

In addition, we expect to review all designs within the territory owned by our member agencies and be reimbursed for this review. The review will provide guidance on technical and regulatory compliance with the California PUC and Federal track and signal standards, SCRRA engineering standards, access for maintenance and preservation

of freight service obligations, preservation of freight and Metrolink expansion plans, and compatibility with the existing Metrolink signal and communications system.

We look forward to hearing from you by June 1, 2007 providing a detailed project schedule in more detail than provided on your website to allow for regular consultation during the process to allow SCRRA to make meaningful comment and appropriately support your project milestones. Should you have any questions regarding our comments, please call me at (213) 452-0273 or Darrell Maxey at (213) 452-0250.

Sincerely,

DAVID SOLOW
Chief Executive Officer

Cc: SCRRA Board
SCRRA Member Agency Executive Directors
SCRRA TAC
Cities of Burbank, Glendale, Lancaster, Los Angeles, Palmdale, San Fernando.

R-1

Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952
213.922.2000 Tel
metro.net

Metro

April 27, 2007

Mr. Dan Leavitt, Deputy Director
ATTN: Los Angeles to Orange County HST
California High-Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Project Level Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Los Angeles (Union Station) to Orange County (Anaheim Regional Transportation Intermodal Center) section of the California High-Speed Train (HST) System. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

A Traffic Impact Analysis (TIA), with highway, freeway, and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2004 Congestion Management Program for Los Angeles County", Appendix D. The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic); and
2. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.

Among the required steps for the analysis of development-related impacts to transit are:

3. Evidence that in addition to Metro, all affected Municipal transit operators received the NOP for the Draft EIR;
4. A summary of the existing transit services in the area;
5. Estimated project trip generation and mode assignment for both morning and evening peak periods;
6. Documentation on the assumptions/analyses used to determine the number and percentage of trips assigned to transit;
7. Information on facilities and/or programs that will be incorporated into the development plan that will encourage public transit usage and transportation demand management (TDM) policies and programs; and
8. An analysis of the expected project impacts on current and future transit services along with proposed project mitigation.

Regarding the segment from the Orange County Line to Los Angeles, there are several additional issues that need to be addressed:

9. The Metro Rail facilities at 320 S. Santa Fe Street, Los Angeles (Division 20) must not be compromised in any way by the construction or operation of the HST Project.
10. The Metro Red Line ROW, including structures and wayside systems, from Union Station to and over the Los Angeles River must not be compromised in any way by the construction or operation of the HST Project.
11. The Metro Gold Line Eastside Extension currently under construction must not be compromised in any way by the construction or operation of the HST Project.
12. The project's potential impact on undeveloped Metro railroad right -of-way (ROW) including the Harbor Subdivision. This corridor has been identified as potential strategic project corridor in the emerging update to Metro's Long Range Transportation Plan (LRTP) and its study area includes the west bank of the LA River between Union Station and the Alameda freight rail corridor.
13. The project's potential impact on bus terminals such as those at Norwalk Transportation Center Metrolink station and the nearby Norwalk Metro Green Line Station will need to be thoroughly addressed to ensure service continuity and access.

In addition, Metro Planning has comments regarding the overall High Speed Rail (HSR) program:

14. Metro Planning is currently actively pursuing AA/DEIS/DEIR phases of several new transportation corridors. Some of these corridor studies will include alternative rail and other transportation uses in similar corridors to HSR. Metro and the High-Speed Rail Authority should coordinate closely to avoid impacts on these corridors. These corridors and program studies include:
    a) Eastside Transit Corridor Phase II, with a study area extending from Union Station and the LA River south of I-5, north of I-10, and east of I-605;
    b) Regional Connector, a light rail connection through downtown LA between Union Station/Little Tokyo and the Blue Line terminus at 7th/Metro Center station;
    c) Westside Transit Corridor, with a study area extending from the Wilshire subway terminus and the Hollywood/Highland station west to the ocean;
    d) Orange Line Canoga corridor extension;
    e) Harbor Subdivision corridor extending from Union Station to LAX and the South Bay, potentially using the West Bank of the Los Angeles River south of Union Station;
    f) The Crenshaw Corridor, a transit corridor between the Exposition light rail line or Wilshire Boulevard and LAX or the

Green Line. This corridor may include a portion of Metro's Harbor Subdivision right of way. This study will include highway and/or rail alternatives;

g) I-710 South corridor between Highway 60 and the Ports of Los Angeles and Long Beach;
h) Metro is evaluating technologies for use on Metro-owned, Metrolink-operated rail lines in Los Angeles County. One technology is Diesel Multiple Unit (DMU) or otherwise self-propelled passenger rail vehicle, but the study is not limited to this technology. One HSR line to be evaluated is identified in the HST study as Metro/Metrolink. The possibility of this operation on existing tracks should be taken into consideration in the project-level EIR.

Other Metro planning efforts relevant to HSR include:

i) The Long Beach Blue Line and Exposition Line Connector study, and analysis including a potential light rail connection between the Washington Blvd./Long Beach Ave. Blue Line station and Union Station on the eastern edge of Downtown LA;
j) Long-term planning for Metro rail yard and maintenance facilities. Potential sites include locations near the LA River and other HSR corridor segments. These yard sites may be compatible with HST storage and maintenance.

Other transit planning efforts not conducted by Metro, but involving Metro infrastructure, may have elements impacted by HSR alignments and programs. These elements include yard storage and maintenance needs. The planning efforts include:

k) A western extension of the Exposition light rail line to Santa Monica; and
l) The Gold Line Foothill extension.

15. Clearly, HST scheduling is critical to avoid conflicts with Metrolink, Amtrak, freight rail, and Metro Rail.
16. Any consideration of potential HSR impacts to freight rail service in Los Angeles County should be in compliance with Metro Goods Movement policies. Metro requests a thorough evaluation of impacts and benefits to goods movement.

17. Metro requests an evaluation of a HSR program that allows existing infrastructure to support incremental improvements that may ultimate in HSR. There are many incremental improvement steps between existing passenger rail service and 225 MPH rail. This evaluation should consider the following:
    a) Incremental upgrades to existing service at speeds of approximately 80-125 mph depending on the operating corridor;
    b) Closing of gaps in the existing statewide passenger rail network;
    c) Electrification of existing passenger and freight rail segments;
    d) Designate incremental higher speed rail corridors in shorter segments which can be implemented in a shorter time frame;
    e) Shorter segment corridors that are not necessarily contiguous;
    f) Funding and budget commitments through existing studies and other creative finance mechanisms;
    g) Environmental clearances and design to match the above initiatives;
    h) A budget an operating plan that is achievable even full funding for statewide HSR is not secured; and
    i) Identify through the study process key Intermodal Transportation Centers, which will support this type of service.

    An accompanying alternative proposal should also:
    j) Identify other longer range planning initiatives to allow additional incremental speed improvements to bring train/corridor segment speeds to higher than 125 mph;
    k) Identify in this planning initiative more incremental segments or extensions to existing incremental higher speed segments;
    l) Identify a plan and a funding commitment to right of way reservations as necessary for possible future alignments;
    m) Identify a plan, funding commitment and schedule to address technical challenges and problem spots not yet addressed from the ultimate project, which may require further study; and
    n) Update an ultimate project plan based on this longer range planning initiative, perhaps in a strategic plan.

21. Metro requests an evaluation of various forms of standard passenger service with more frequent stops within the HSR ROW. For example, upon completion of HSR between Palmdale and Bakersfield, would conventional or semi-high-speed (125 MPH) passenger rail be able to operate in the corridor? Amtrak currently operates a bus bridge between Bakersfield and LA Union Station. It would be less than optimum if travelers had no travel service options filling the quality and price range between bus service and high-speed rail in this corridor. The identification of dedicated passenger rail rights of way would be a benefit potentially shared by all operators.

22. Metro requests an evaluation of HSR or semi-high-speed rail service with a ticket fare structure that presents a reasonable alternative to shift freeway trips to rail. The HSR appears to be designed to compete with airlines. That presents the expectation of airline-similar fares. A focus on pricing commensurate with auto driver diversion may suggest moderate initial speeds and/or travel discounts.
23. Metro requests that the operating energy, operating cost and potential energy savings of HSR at initial speeds of 125 miles per hour be considered in addition to very high speed operation.
24. Metro owns the railroad ROW along both the East and West Banks of the Los Angeles River throughout Downtown Los Angeles from North to South. The ROW is currently used in whole or part by Amtrak, Metrolink and a variety of freight railroads. The HSR Construction Authority and its consultants should coordinate with Metro on the future plans for this ROW during all phases of the HSR development process. Metro staff is prepared to coordinating with the HSR and its consultants to ensure that potential HSR needs accommodate future design assumptions. Please include potential impacts to Amtrak, Metrolink, freight rail and Metro Rail.
25. Metro, Metrolink, Amtrak, freight and HSR plans for LA River-adjacent track need to comply with the principles of the LA River Revitalization Master Plan. These principles promote a sustainable and greener Los Angeles River as part of Regional Transportation and Environmental Goals.
26. For segments along the LA River in downtown LA, Metro requests that the HSR Authority considers placing these track segments within at-grade reinforced concrete box structures suitable for enclosure within soil. Such an approach would allow surface level landscaping, bike and pedestrian paths, mixed-use transit oriented development, and passive recreation along the L.A. River.
27. Please evaluate how the placement of HSR tracks in surface level box structures covered in soil would allow the trains to approach stations at relatively high speed without noise or visual impacts on the surrounding community.
28. Please evaluate how joint development above tracks within box structures can help the HSR Authority to recover construction costs. Joint development efforts should be coordinated with the Los Angeles City Planning Department, the LA Community Redevelopment Agency, Metro Real Property Management and Development, and possibly Amtrak or other agencies. Joint Development coordination with Metro should be arranged through Mr. Roger Moliere, Chief, Real Property Management and Development, at 213-922-2225.
29. The EIS/EIR should fully identify HSR rail facility needs. It is likely that any successful HSR design will need Los Angeles area rail yards. The effort to find a suitable HSR rail yard should be part of an interagency effort to provide an adequate unified rail yard.

30. Curved station platforms have been successfully implemented along other HSR networks and should be thoroughly evaluated for Los Angeles County. For example, EuroStar rail service through the Channel Tunnel successfully terminates at its west end at a severely curved London Waterloo Station. The use of stations with one or more curve will avoid otherwise unavoidable extreme costs and allow cost-effective long platform stations.
31. Revenue estimates should be compared to Acela Northeast Corridor, the Shinkansen, the TGV, the ICE, EuroStar and other HSR. Based upon prior history, demonstrate why failed bond issues would not be the California experience. Revenues from HSR between London and Paris were insufficient to pay the capital cost bonds and refinancing has proven necessary. The proposed routes within California are longer than those between London and Paris and the size of the destination city at one end substantially smaller than the European examples.
32. Thoroughly analyze the response of airline carriers to HSR where it has been implemented elsewhere and show what this means for California.
33. Sensitivity analysis should be conducted showing the cost impacts of less than expected revenue.
34. Please discuss appropriate HSR train and platform length based on all modeling scenarios. Please show how platform lengths allow future capacity and expansion. Based on aerial photo analysis, platforms at London's Waterloo Station are approximately 1,300 feet in length.
35. If previous Metro-funded improvements are impacted by HSR, these should be mitigated. In its role as funding agent for Los Angeles County transportation projects, Metro has provided funding for many transit, bikeway, pedestrian, street widening, freeway, signal technology, transportation enhancements and other improvement projects throughout the past several years. Metro encourages all possible preservation of these recent civic improvements in the consideration of alignment and station designs as HSR progresses into more detailed design.

Metro looks forward to reviewing the Draft EIR. If you have any questions regarding this response, please contact Susan Chapman on my staff at 213-922-6908 or by email at chapmans@metro.net. Please send the Draft EIR to the following address:

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Susan Chapman

Sincerely,

Brad McAllester

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May 1, 2007

Mr. Dan Leavitt
Deputy Director
California High Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

Dear Mr. Leavitt:

First, I would like to offer congratulations to the California High-Speed Rail Authority in advancing your project to the EIR/EIS stage for the Los Angeles to Orange County corridor. Your project is of great significance to the southern California region.

The comments listed below are in addition to the recent comments sent to you by SCAG in an intergovernmental review letter dated April 24, 2007. The proposed "No-Action" alternative cited in your document represents the region's transportation system as it would exist after completion of programs or projects currently planned for funding and implementation by 2030. It should be noted that while it is labeled the "No-Action" alternative, it is essentially the "Baseline" alternative because it includes all programs in the region that are in the pipeline to be funded and built. Please note this "No-Action" alternative as the "Baseline" alternative in future references.

As a Regional Planning agency, SCAG supports any high-speed rail project that is consistent with, and coordinated with the planned regional transportation projects and programs for the southern California region. Thus, it is our recommendation that any planning for a statewide high-speed train system should include linkages between the CHSRA system and other systems, including a SCAG Maglev/high-speed rail system. This interconnectivity between systems will be stressed in the 2007 RTP due out in December of this year.

SCAG is interested in working with CHSRA and providing you with data from our 2004 Regional Transportation Plan, which is the most recently adopted RTP for the region. Please feel free to contact me with any additional questions or comments at 213 236-1819 or via email at marcus@scag.ca.gov. We look forward to working with you and CHSRA staff in the future as this project continues to move forward.

Sincerely,

Richard J. Marcus
Manager, Maglev/High-Speed Rail Program

cc: Jacob Lieb, SCAG
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